

**IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF OKLAHOMA**

THOMAS E. PEREZ, Secretary of Labor,  
United States Department of Labor,

Plaintiff,

v.

EL TEQUILA, LLC, and  
CARLOS AGUIRRE, Individually,

Defendants.

Case No. 12-CV-00588-JED-PJC

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**DEFENDANT EL TEQUILA'S  
SECOND MOTION TO COMPEL DISCOVERY**

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COMES NOW the Defendant El Tequila and in support of its Motion to Compel Discovery alleges and states:

1. Defendant propounded written discovery to the Plaintiff.
2. Plaintiff objected to all discovery based on certain asserted privileges
3. Plaintiff provided partial and incomplete responses.
4. Defendant files this Motion requesting the Court to compel the Plaintiff to properly respond to the discovery.
5. Defense counsel has conferred in good faith with Plaintiff's counsel regarding these discovery disputes. The attorneys were unable to resolve the disputes.
6. Defendant simultaneously files its Brief in Support of the Motion to Compel Discovery.

WHEREFORE, Defendant prays the Court to grant the Motion to Compel Discovery, together with attorney fees and costs.

Respectfully submitted,

WILKINSON LAW FIRM

By: s/ Bill Wilkinson  
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ATTORNEY FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 12th day of August 2014, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Matthew P. Sallusti  
U.S. DEPARTMENT OF LABOR  
525 Griffin Street #501  
Dallas TX 75202  
ATTORNEY FOR PLAINTIFF

s/ Bill Wilkinson  
Bill V. Wilkinson